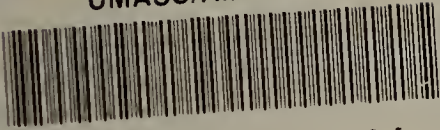


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S. Russell Sylva
Commissioner

Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Quality Engineering

Memorandum

Division of
Solid Waste
Management

1 Winter Street
Boston, MA 02108

L. James Miller
Director

TO: L. James Miller
FROM: Beatrice Nessen *BN*
THROUGH: Philip Weinberg *PW*
DATE: March 24, 1988
RE: Asbestos Guidelines

Enclosed guidelines pertaining to storage and transfer of asbestos have been reviewed and approved by Bruce Maillet and appropriate DAQC staff, DSWM regional section chiefs, and DREES. The guidelines have been developed in response to many questions raised by asbestos removal companies. We believe this document incorporate a practical and workable solution to asbestos collection, storage and disposal.

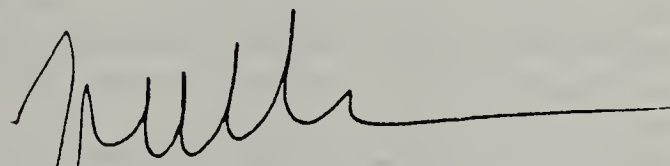
Please indicate below whether you approve these guidelines and authorize their distribution.

GOVERNMENT DOCUMENTS
COLLECTION

OCT 26 1998

University of Massachusetts
Depository Copy

Approved by


L. James Miller, Director
Division of Solid Waste management
3/24/88

Date

Guidelines for Storage, Consolidation, and
Transfer of Asbestos Waste

Division of Solid Waste Management

February 1988

The Department is particularly concerned about the handling of asbestos wastes during consolidation and transfer operations at sites other than the point of origin or the premises of the removal contractor. Such otherwise unregulated sites would also be unavailable for inspection to determine compliance with appropriate statutes and regulations and pose potential risks to populations unaware of the existence of the waste product. The Department believes the following interpretation of the transfer station requirements is reasonable and necessary to protect the citizens of the Commonwealth from exposure to this potentially harmful product during handling, consolidation, and transfer operations.

Definitions

Site of Origin - A location, such as demolition/renovation or construction site where asbestos removal is actively taking place.

Containerized Asbestos - Asbestos that is bagged, drummed and/or stored in secondary containers, such as roll-offs or dumpsters, meeting requirements set forth under statute or regulation.

Premise - The place of business of the company removing asbestos from the site of origin.

Temporary Storage - Storage of asbestos for a period not exceeding 30 days.

A. Activities Not Requiring Site Assignment or Plan Approval as a Solid Waste Facility:

(1) Temporary storage at a site of origin of secured, properly containerized asbestos.

(2) Containerized asbestos transported directly from a site of origin to an approved disposal facility.

(3) Containerized asbestos picked up from multiple sites of origin and transported directly to an approved disposal facility.

(4) Occasional overnight or over weekend layover of a vehicle holding containerized asbestos, prior to final transport to an approved disposal facility. However, the vehicle must be properly secured either at a point of origin of the waste, or at a location under the jurisdiction of the party responsible for the transport of the asbestos, and not in conflict with any other federal, state, or local laws or regulations.

(5) Temporary storage of containerized asbestos removed by the contractor, or the transfer/consolidation of such material in a vehicle or secondary container on the premises. However, the storage vehicle or secondary container must be covered and the premises must be secured and not be in conflict with any other federal, state, or local laws or regulations.

(6) Transfer/consolidation of containerized asbestos at an active site of origin.

B. Activities Requiring Site Assignment and/or Departmental Approval as a Solid Waste Facility Include:

(1) Any removal of containerized asbestos from a vehicle and subsequent storage at a location, not the site of origin or the premises of the removal contractor prior to transport to an approved disposal facility.

(2) Any storage container placed at a location other than a site of origin or on the premises of the removal contractor where asbestos is collected and/or stored prior to transport to an approved disposal facility.

(3) Any offsite or off-premises transfer of containerized asbestos from vehicle to vehicle or container to container.

(4) Any use of an existing transfer station, as defined by 310 CMR 18.00 without specific prior approval by the Department for handling asbestos. Where asbestos is approved by the Department at a transfer station it must be managed independently of other solid wastes at such a facility.

(5) Use of an existing landfill as a storage area prior to transport to another facility for disposal unless the site has been approved for such practices.

(6) Any site where asbestos is stored for greater than 30 days after removal and prior to disposal at an approved disposal facility.

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